

# Exhibit 4

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

- - -

ABDULLAH JAMES GEORGE WILSON,	:	C.A. No: 14-CV-02477-JPO
on behalf of himself and others	:	
similarly situated,	:	
	:	
Plaintiffs,	:	
	:	
- against -	:	
	:	
CORELOGIC SAFERENT, LLC,	:	
	:	
Defendant.	:	
	:	

- - -

VIDEOTAPED DEPOSITION OF PMK, ANGELA BARNARD,  
taken at TROUTMAN SANDERS, LLC, located at 11682 El Camino  
Real, Suite 400, San Diego, California, on Wednesday,  
July 20, 2016, at 8:06 a.m., before Jennifer Gibson,  
CSR No. 12802, a Certified Shorthand Reporter in the  
state of California.

- - -

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**ANGELA BARNARD**

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16 Also Present: Lynda Dixon, Video Specialist  
17  
18  
19  
20  
21  
22  
23  
24  
25

**ANGELA BARNARD**

## I N D E X

WITNESS: Angela Barnard

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By Ms. Brennan	5
By Mr. St. George	74

## E X H I B I T S

EXHIBIT	MARKED
Exhibit No. 1 - Amended Notice of Deposition	4
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**ANGELA BARNARD**

1 SAN DIEGO, CALIFORNIA;  
2 WEDNESDAY, JULY 20, 2016, 8:06 A.M.

3 (Exhibit Nos. 1 and 2 premarked for identification.)

4 VIDEOGRAPHER: Good morning. The time on the  
5 record is 8:06 a.m. Today's date is July 20th, 2016. My  
6 name is Lynda Dixon, contracted by Summit Court Reporting of  
7 Philadelphia, Pennsylvania. The court reporter today is  
8 Jennifer Gibson.

9 This begins the videotaped deposition of Angela  
10 Barnard, testifying in the matter of Wilson versus care  
11 logic[sic] -- CoreLogic in the United States District Court,  
12 Southern District of New York, Case No. 14-CV-02477-JPO,  
13 taken at 11682 El Camino Real, Suite 400, San Diego,  
14 California 92130.

15 The video and audio recordings will take place  
16 at all times during this deposition unless all counsel agree  
17 to go off the record. The beginning and end of each  
18 videotape will be announced. Will counsel please identify  
19 yourselves and state whom you represent.

20 MS. BRENNAN: Lauren Brennan of Francis &  
21 Mailman on behalf of Abdullah James George Wilson, the  
22 Plaintiff.

23 MR. ST. GEORGE: Timothy St. George on behalf  
24 of CoreLogic SafeRent, LLC, the Defendant.

25 THE VIDEOGRAPHER: The court reporter may now

**ANGELA BARNARD**

1 swear in the deponent.

2 -oOo-

3 Whereupon,

4 ANGELA BARNARD,

5 having been first duly sworn, testified as follows:

6 -oOo-

7 EXAMINATION

8

9 MR. ST. GEORGE: And, Lauren, I'll just note at  
10 the outset on the record that we've ordered a copy of the  
11 transcript, and the witness will read and sign as well.

12 MS. BRENNAN: Okay. And just to be clear, the  
13 defendant in this matter is CoreLogic SafeRent, LLC. Are  
14 we --

15 MR. ST. GEORGE: Agreed.

16 MS. BRENNAN: I believe the -- Okay. I believe  
17 the caption may have just said "CoreLogic." So to be clear,  
18 we're talking about the CoreLogic SafeRent, LLC, entity.

19 BY MS. BRENNAN:

20 Q. Good morning, Ms. Barnard.

21 A. Good morning.

22 Q. Could you please, just for the record, state  
23 and spell your full name.

24 A. Sure. It's Angela Barnard. A-n-g-e-l-a  
25 B-a-r-n-a-r-d.

[illegible]

**ANGELA BARNARD**

## REPORTER'S CERTIFICATE

STATE OF CALIFORNIA            )  
   ) ss:  
 COUNTY OF SAN DIEGO         )

I, Jennifer Gibson, a Certified Shorthand Reporter  
 for the State of California, CSR No. 12802, do hereby  
 certify:

That the witness in the foregoing deposition was first  
 duly sworn by me to testify to tell the truth, the whole  
 truth, and nothing but the truth in the foregoing cause;  
 that the deposition was taken before me at the time and  
 place herein named; that the said deposition was reported  
 stenographically by me and transcribed through computer-  
 aided transcription under my direction; and that the  
 foregoing is a true record of the testimony elicited at said  
 deposition.

I do further certify that I am a disinterested person  
 in no way interested in the outcome of this action or  
 connected with or related to any of the parties or to their  
 respective counsel.

In witness whereof, I have hereunto set my hand this  
 \_\_\_\_\_ day of \_\_\_\_\_, 2016.

\_\_\_\_\_  
 JENNIFER GIBSON, CSR No. 12802